

# **EXHIBIT B**

**Wes Rahn**

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**From:** Wes Rahn  
**Sent:** Friday, February 9, 2024 3:00 PM  
**To:** Cary Ichter; Ben Perkins; Marilyn Marks; Jennifer Dorminey Herzog; Bruce Perrin Brown Esq. (bbrown@brucepbrownlaw.com)  
**Cc:** Halsey G. Knapp, Jr.; Adam M. Sparks; Nick Kinsley; Anthony A. Rowell; Jill Connors; Melissa Boehlke  
**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline  
**Attachments:** 25 Documents.zip

Cary,

Thank you for confirming that in exchange for production of the 25 documents, Plaintiffs will withdraw their motion for in camera review. Also, thank you for confirming Plaintiffs will not contend that the production of those documents constitutes a waiver with respect to any other documents.

While we feel the documents are not responsive, not reasonably calculated, not proportional, and/or privileged, we have decided that further argument over those questions would result in a waste of judicial resources and Coffee County taxpayer dollars. Attached are the documents. Please file your notice of withdrawal of the motion.

Regarding your request for extension of time to file a sanctions motion, we do not believe Plaintiffs have a reasonable basis to seek sanctions. If you are able to further explain the basis for any sanctions Plaintiffs intend to seek, we are willing to reevaluate our position.

Best,

**Wes Rahn**



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**From:** Cary Ichter <CIchter@IchterDavis.com>  
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**Cc:** Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Nick Kinsley <NKinsley@hallboothsmith.com>; Anthony A. Rowell <ARowell@hallboothsmith.com>; Jill Connors <JConnors@IchterDavis.com>; Melissa Boehlke <mboehlke@olivermaner.com>  
**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Ben: We are agreeable to drop our motion for in camera review upon the production of those documents that were to be subject to the review. Also, we will not contend that the production of those documents constitutes a waiver with respect to any other documents. Those are the only concession are making in connection with the production of documents sought for in camera review. Please provide those documents at your earliest convenience.

As for Plaintiffs' planned motion for sanctions, we still plan to file such a motion, after conferring with you to seek to resolve this significant issue without the court's involvement. Plaintiffs feel strongly that CCBOER's improper withholding of documents such as the video security records, Hampton's emails, Board members' communications, and relevant James Barnes' and Rachel Roberts' emails archived but not produced by CCBOER, among other responsive and withheld records, disrupted and unnecessarily expanded the litigation at great expense and prejudice to the plaintiffs. I will be reviewing the documentation of these issues over the next few days and will be in touch hoping to confer with you to achieve a settlement without involving the court.

If we hope to make any headway with respect to resolving those issues, I think it will take more time than we have right now (10 days as of tomorrow) particularly given the volume of post-trial activity that continues with the *Curling* case. So, if we are going to negotiate a potential resolution, we would require that we jointly approach the court for an additional ten (10) days to file the sanctions motion so we have time to work on settlement.

Pls let me know if you and your client are agreeable to these terms. Cary

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**From:** Ben Perkins <[bperkins@olivermaner.com](mailto:bperkins@olivermaner.com)>  
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**To:** Cary Ichter <[Cichter@IchterDavis.com](mailto:Cichter@IchterDavis.com)>; Wes Rahn <[wrahn@olivermaner.com](mailto:wrahn@olivermaner.com)>; Marilyn Marks <[marilyn@uscg.org](mailto:marilyn@uscg.org)>; Jennifer Dorminey Herzog <[jherzog@hallboothsmith.com](mailto:jherzog@hallboothsmith.com)>; Bruce Perrin Brown Esq. <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)> <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>

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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Cary,

I believe we're on the same page that production of the 25 documents will moot the motion for in camera review (item 1). We obviously agree about item 2. Regarding your question (which relates to item 3), I'm not aware of any basis for Plaintiffs to seek sanctions, which is the reason I thought item 3 was a reasonable proposal. But based on your response, I gather that Plaintiffs are contemplating seeking sanctions for one or more of the issues referenced in Plaintiffs' motion to compel. If my understanding is correct, then Plaintiffs could counter by proposing to carve the issue(s) out of item 3.

Have a good evening,

Ben Perkins  
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912-238-2515

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**From:** Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>  
**Sent:** Tuesday, February 6, 2024 5:11 PM  
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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Ben: I disagree. My emails said, "I appreciate that. If we get this sorted out, we will withdraw the motion." We didn't get this all sorted out b/c you made demands we did not accept. So, the motion is still pending and will not be withdrawn. We do not, however, intend to claim that CCBOER has waived any privilege as a consequence of what it has produced or will produce. I think that addresses the second bullet point. The first and third remain pending. Are you asking me for a proposal re sanctions—i.e., a dollar amount? Cary

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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Cary,

Thanks. Our proposal has three components. The first (withdrawal of the motion) was already agreed to, based on your Jan. 29, 6:31 p.m. email. The second is black-letter law, so Plaintiffs aren't giving up anything there. That's 2 out of 3, and the 3<sup>rd</sup> component isn't much of an ask given the Court's ruling on the motion to compel. Since the Court has repeatedly asked us to try to work things out amongst ourselves, I must ask: do Plaintiffs intend to make a counter proposal?

Ben Perkins  
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**From:** Cary Ichter <[Cichter@IchterDavis.com](mailto:Cichter@IchterDavis.com)>

**Sent:** Tuesday, February 6, 2024 12:53 PM

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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Sorry for the delay. We appreciate the offer, but we would prefer to have the court examine the withheld documents and consider all that has occurred in connection with a future sanctions motion. Cary

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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Cary,  
I'm following up on the below.

Ben Perkins  
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---

**From:** Cary Ichter <[Cichter@IchterDavis.com](mailto:Cichter@IchterDavis.com)>  
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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Ben: I will get back to you over the weekend or on Monday. Cary

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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Cary,

In Plaintiffs' motion for in camera review, they request that the Court review 25 documents listed on the privilege log. I propose a compromise: in exchange for the CCBOER producing the 25 documents in their entirety, Plaintiffs would agree:

- to withdraw their motion for in camera review;
- to not later contend that by producing the 25 documents at issue in the motion for in camera view, that the CCBOER waived the right to assert that other correspondence (including but not limited to correspondence involving Mr. Dial or other independent contractors) has been waived; and
- to not seek sanctions on any of the discovery/open records act issues referenced in Plaintiffs' motion to compel.

Please let us know if Plaintiffs agree to this proposal. If so, we will immediately produce the documents.

Thanks,

Ben Perkins  
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**From:** Wes Rahn <[wrahn@olivermaner.com](mailto:wrahn@olivermaner.com)>

**Sent:** Monday, January 29, 2024 6:27 PM

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**Subject:** Re: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Good evening, Cary,

We have not had an opportunity to reevaluate the 25 documents you identified in your email earlier today at 3:07 PM. We plan on reviewing and providing a response tomorrow.

Thanks,

**Wes Rahn**



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**From:** Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>

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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

The list I provided reflects all the documents on which Mr. Dial is copied. The waiver argument we have regarding Mr. Dial is the same for all those documents. I understand that we have not discussed these additional documents before, but if the privilege is waived by the disclosure to Mr. Dial for some of the documents, it is waived for all such documents. I would have discussed this with you sooner, but as I explained in my motion for a further extension of time, getting the attention of any members of the *Curling* trial team has been a challenge, which you, as a trial lawyer, can appreciate, I am sure.

There is a total of 25 documents on the list I provided. We will not be objecting to any further designations. If you require additional time to review them, I will be happy to join with you to request that the Court provide you with whatever time you need.

Failing that, I will be filing a motion today. Cary

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**Subject:** RE: Service of Privilege Log; Response to Request for Extension of Sanctions Motion Deadline

Cary,  
To my knowledge, xREL000064575, xREL0064583, and xREL000074286 are the only ones involving Mr. Dial that you and I have communicated about since the privilege log was produced on January 3, 2024.

Ben Perkins  
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